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9  
10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA  
12

13 LUCERO SANCHEZ,

14 Plaintiff,

15 vs.

16 RENOWN HEALTH, a non-profit Nevada  
17 Corporation, and DOES 1-20, inclusive,

18 Defendant.

Case No.: 3:21-cv-00352-MMD-CSD

**STIPULATION AND ORDER TO  
EXTEND DEADLINES FOR RESPONSE AND  
REPLY TO MOTION FOR SUMMARY  
JUDGMENT**

**[SECOND REQUEST]**

19 Plaintiff Lucero Sanchez (“Plaintiff” or “Sanchez”) and Defendant Renown Health  
20 (“Defendant” or “Renown”) (collectively, the “Parties”), by and through their respective counsel,  
21 hereby stipulate and agree that the deadline for the Plaintiff to respond to the Defendant’s August  
22 11, 2023 Motion for Summary Judgment [ECF #69] be extended by a period of twenty one 21 days  
23 to October 6, 2023.

24 The attorney representing the Plaintiff has multiple commitments with deadlines close to  
25 the current deadline for replying to the Defendant’s motion. The motion itself has detailed factual  
26 and legal points that need significant time for a thorough response. Therefore, both parties ask the  
27 Court to provide the Plaintiff and Defendant with more time to address the motion effectively.

28 Further, counsel for the Defendant will be serving as a hearing officer for a three-day  
hearing scheduled on the dates of October 10<sup>th</sup> through October 13, 2023. Upon the conclusion of

1 the hearing, Defendant's counsel will be required to issue findings and conclusions within a 10-day  
2 window. Given these commitments, the parties request an extension of the deadline for Plaintiff's  
3 opposition to the Motion to October 6th, 2023, and an additional two-week extension until  
4 December 3, 2023 for the Defendant's reply.

5 DATED: September 11, 2023

Dated: September 11, 2023

6 BY: /s/ Sandra Ketner, Esq.

7 Sandra Ketner, Esq.  
8 Simons Hall Johnston PC  
9 690 Sierra Rose Drive  
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11 Telephone: (775) 785-0087

BY: /s/ Luke Busby, Esq.

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19 **IT IS SO ORDERED.**



20 **DISTRICT COURT JUDGE**

21 DATED: September 12, 2023